

SEP 01 2005

Colin M. Thompson, Esq.
Law Offices of Colin M. Thompson
J.E. Tenorio Building
PMB 917 Box 10001
Saipan, Mariana Islands 96950
Telephone: (670) 233-0777
Facsimile: (670) 233-0776

For The Northern Mariana Islands
By _____
(Deputy Clerk)

*Attorney for Century Insurance Company Ltd. and
Hongkong Entertainment Investment Ltd.*

IN THE DISTRICT COURT

FOR THE

NORTHERN MARIANA ISLANDS

**ELENITA S. SANTOS and
ANGEL SANTOS,**

Plaintiffs,

vs.

**HONGKONG ENTERTAINMENT
(OVERSEAS) INVESTMENT LTD .dba,
TINIAN DYNASTY HOTEL & CASINO and
CENTURY INSURANCE CO., LTD.**

Defendants.

Civil Action No. 04-0030

**DECLARATION OF
PAUL BARON**

Date : September 1, 2005

Time : 9:00 a.m.

Judge: Hon. Alex R. Munson

I, Paul Baron, do declare that:

1. I am a registered Professional Engineer in the Commonwealth of the Northern Mariana Islands and Guam. I make this declaration based on my personal knowledge and I am competent to testify as to the matters set forth.

2. At the request of Colin Thompson, I reviewed the architectural drawings and construction plans on file at the Department of Public Works (DPW) for the Tinian Dynasty Hotel and Casino.

3. I also reviewed all available files at the DPW relating to the issuance of occupancy permits, notice of violations, inspection reports and other related documents for the Tinian Dynasty Hotel and Casino, the staff housing and other main buildings.

5 5. A Department of Public Work's employee indicated to me that the absence of any
6 permit may indicate that the subject stairs did not require a building permit because the stairs do not
connect directly to the exit of any building.

8 6. I found no record of any violation of the building code related to the subject stairs on
file at DPW.

7. The findings noted in this declaration are true and accurate as of this date. However, these findings are preliminary and additional investigation is necessary in order to prepare a more complete and conclusive opinion as to whether or not there was a violation of the building code for the subject stairs .

14 8. I reported these facts to Mr. Thompson on the afternoon of August 30, 2005 to
15 facilitate the preparation of this declaration.

I declare by penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

18 Dated this First day of September, 2005.

Paul K. Baron
PAUL K. BARON, P. E.
 EFC Engineers and Architects